

**DOVEL & LUNER, LLP**

Richard Lyon (Cal. Bar No. 229288)

Rick@dovel.com

Gabriel Doble (Cal. Bar No. 335335)

gabe@dovel.com

201 Santa Monica Blvd., Suite 600

Santa Monica, California 90401

Telephone: (310) 656-7066

Facsimile: (310) 656-7069

*Attorneys for Plaintiff*

**WHEELER TRIGG O'DONNELL LLP**

Andrew M. Unthank (pro hac vice)

unthank@wtotrial.com

370 Seventeenth Street, Suite 4500

Denver, CO 80202-5647

Telephone: (303) 244-1800

Facsimile: (303) 244-1879

*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION**

DEBRA GOLDSTEIN, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

WHIRLPOOL CORPORATION,

Defendant.

Case No. 2:23-cv-04752-JWH-JDE

**STIPULATED MOTION TO  
VACATE CASE MANAGEMENT  
DEADLINES PENDING RULING  
ON MOTION TO DISMISS**

Place: Courtroom 9D

Judge: Hon. John W. Holcomb

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2 Plaintiff Debra Goldstein and Defendant Whirlpool Corporation. stipulate, via  
3 counsel, to the following:

4 WHEREAS, on April 26, 2024, the Court entered an Order setting a briefing  
5 schedule on Plaintiff's anticipated Motion for Class Certification, with Plaintiffs'  
6 anticipated motion due February 21, 2025, and Whirlpool's anticipated opposition  
7 due April 25, 2025 (ECF No. 59).

8 WHEREAS, Plaintiff subsequently amended her pleading in this matter (ECF  
9 No. 63) and Whirlpool thereafter moved to dismiss Plaintiff's amended pleading  
10 (ECF No. 68). The Court held a hearing on Whirlpool's motion to dismiss on  
11 November 22, 2024 (ECF No. 74). During that hearing, the Court took the motion to  
12 dismiss under advisement and advised the parties that if the Court were delayed in  
13 issuing its order on the motion to dismiss the parties should submit a stipulation to  
14 address the pending case management deadlines. (*See* ECF No. 76; Tr. 114:24-115:5.)

15 NOW, THEREFORE, the Parties, by and through their respective undersigned  
16 counsel, hereby stipulate and agree, subject to approval by the Court, that Plaintiff's  
17 deadline to file its anticipated Motion for Class Certification, and Defendant's  
18 deadline to file its anticipated opposition, shall be VACATED. The Parties further  
19 stipulate and agree that in the event the Court's forthcoming order on Whirlpool's  
20 motion to dismiss allows any claims to proceed, they shall meet and confer within 14  
21 days of that order to discuss the status of the matter. Within 14 days following the  
22 Parties' conference they shall submit a joint status report to the Court.

1                   **SO STIPULATED.**

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4       Dated: February 14, 2025

Respectfully submitted,  
WHEELER TRIGG O'DONNELL LLP

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7                   By: /s/ Andrew M. Unthank  
8                               *Attorneys for Defendant Whirlpool*  
9                               *Corporation*

10       Dated: February 14, 2025

DOVEL & LUNER LLP

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13                   By: /s/ Gabriel Doble

14                   Richard Lyon (Cal. Bar No. 229288)  
15                   rick@dovel.com  
16                   Christin Cho (Cal. Bar No. 238173)  
17                   christin@dovel.com  
18                   Simon Franzini (Cal. Bar No. 287631)  
19                   simon@dovel.com  
20                   Jonas B. Jacobson (Cal. Bar No. 269912)  
21                   jonas@dovel.com  
22                   Gabriel Doble (Cal. Bar No. 335335)  
23                   gabe@dovel.com  
24                   DOVEL & LUNER, LLP  
25                   201 Santa Monica Blvd., Suite 600  
26                   Santa Monica, California 90401  
27                   Telephone: (310) 656-7066  
28                   Facsimile: (310) 656-7069

*Attorneys for Plaintiffs*

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**Attestation**

I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

/s/ Andrew M. Unthank